

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-PP

SECOND DECLARATION OF TAL BENARI

I, Tal Benari, swear as follows:

1. I am over 18 years old and have personal knowledge regarding the facts set forth in this Declaration. If called to testify, I could and would testify competently regarding the facts recited herein.

2. I am the registered agent for service of process under California law for Chrome Media LLC, a documentary film production company whose members are Defendants Laura Ricciardi and Moira Demos. Chrome Media is a limited liability company organized under the laws of New York.

3. The address provided to the New York Department of State for it to forward process served on Chrome Media is in care of me at the office address of the accounting firm where I am employed, R.C. Baral & Company, Inc. Mss. Ricciardi and Demos do not use and

have never used the offices of my employer to conduct Chrome Media's business or for any other purpose of which I am aware.

4. My firm, R.C. Baral & Co., provides production accounting and tax services for Chrome Media. I am not and have never been an officer, director, managing agent or employee of Chrome Media and I have never had any role in its management. I do not have any authority, control, supervision or discretion over the business affairs of Chrome Media, in whole or in part.

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of June, 2019.


Tal Benari